18

19

20

2.1

22

23

24

25

26

27

28

BANKRUPTCY LAW GROUP, PC Chad M. Johnson, SBN: 232417 Pauldeep Bains, SBN: 268004 1851 Heritage Lane, Suite 298

Sacramento, CA 95815 Tel: 916-678-5000 Fax: 888-843-7260

PaulB@BankruptcyLG.com

Attorneys for Debtor(s)
Stanley Mayfield

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT COURT OF CALIFORNIA

In re: Case No: 16-22134-D-7

Stanley Mayfield Chapter: 07
DCN: UST-1

Debtor(s). DECLARATION OF PAULDEEP BAINS IN SUPPORT

OF THE REPLY TO THE MOTION OF THE UNITED STATES TRUSTEE FOR IMPOSITION OF

SANCTIONS

Date: June 15, 2016 Time: 10:00 A.M.

Judge: Honorable Robert Bardwil

Courtroom: 6th Floor, Court Rm 34, Dept D

I, Pauldeep Bains, the attorney of record in this case for Debtor Stanley Mayfield, in support of the "Reply to the Motion of the United States Trustee for Imposition of Sanctions" filed concurrently with this declaration, hereby declare under penalty of perjury under the laws of the State of California the following:

- I have personal knowledge of this declaration herein and am competent and willing to testify if called upon to do so.
- 2. I am a citizen of the United States and the state of California.
- 3. I have read and understand the Local Rules of this Bankruptcy Court.
- 4. On March 4, 2016, I conducted an initial consultation with Stanley Mayfield ("Debtor").
- 5. Between the dates of March 4, 2016, and March 8, 2016, I had communication with Debtor over several back-and-forth emails.

- 6. On March 10, 2016, I conducted an analysis of the "Chapter 7 Statement of Your Current Monthly Income" for Debtor.
- 7. On March 10, 2016, after reviewing the "Chapter 7 Statement of Your Current Monthly Income", I called Debtor and left him a voicemail describing my findings.
- 8. On March 11, 2016, both Debtor and I signed the fee agreement for Debtor to retain my office.
- On March 15, 2016, I called and spoke with Debtor on the phone to thoroughly review our Bankruptcy Packet that he needed to complete in order to prepare his case.
- 10. On April 1, 2016, at 5:30 PM, I had a phone meeting with Debtor wherein we reviewed page-by-page a draft of his petition, schedules, statement of financial affairs, and any other documents to be filed with his Chapter 7 Bankruptcy case.
- 11. During this conversation, we discussed any changes that needed to be made to the draft.
- 12. On April 1, 2016, and April 4, 2016, I made all of the necessary changes that Debtor and I discussed to ensure the complete accuracy of his filing.
- 13. On April 4, 2016, I signed a final copy of all of the documents that required my signature for Debtor's filing.
- 14. On April 7, 2016, at 8:26 AM, I received an email from Irma H. Garcia requesting copies of the signatures in Debtor's bankruptcy case. The email stated that Irma H. Garcia was a Legal Tech for the United States Trustee for the Eastern District of California ("UST").
- 15. On April 7, 2016, at 12:48 PM, I replied to Ms. Garcia in an email with an attachment of a PDF that contained the original manual signatures in Debtor's case. Please find filed by the UST in this matter as **EXHIBIT 1** the PDF document that I sent to Ms. Garcia, which bears the original manual signatures of both the Debtor and myself. This is the same document that was actually filed with the Court (docket entry 1).
- 16. Moreover, on April 15, 2016, at 4:16 PM, I sent the UST (in particular, Antonio Darling, Irma Garcia, and Judy Hotze) a declaration signed by the Debtor in which he attests to the fact that he did intend to and actually did sign the original documents filed in this case. Please find filed as EXHIBIT 7 by the UST the Debtor's Declaration.

Case 16-22134 Filed 05/31/16 Doc 21

17. **EXHIBIT 1** is both the documents filed in Debtor's bankruptcy case and the documents that were sent to the UST on April 7, 2016, at 12:48 PM.

I, Pauldeep Bains, declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE: 5-31-16

Pauldeep Bains, Declarant